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9 United States of America

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11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

13 14 15	UNITED STATES OF AMERICA, v. ERIC TERRELL CHRISTIAN, Defendant.	CASE NO. 2:22-CR-00196-WBS STIPULATION REGARDING EXCLUDABLE TIME PERIODS UNDER SPEEDY TRIAL ACT; FINDINGS AND ORDER DATE: January 9, 2023 TIME: 9:00 a.m. COURT: Hon. William B. Shubb
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17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for status on January 9, 2023.  
21 2. By this stipulation, defendant now moves to continue the status conference until March  
22 27, 2023 at 9:00 a.m., and to exclude time between January 9, 2023, and March 27, 2023, under Local  
23 Code T4.  
24 3. The parties agree and stipulate, and request that the Court find the following:  
25 a) The government has represented that the discovery associated with this case  
26 includes over 160 gigabytes of discovery, including police reports, body camera footage,  
27 criminal history documents, and two forensic extractions of a cellular telephone. All of this  
28 discovery has been either produced directly to counsel and/or made available for inspection and

1 copying. The bulk of this discovery consists of the forensics extractions, which were recently  
2 produced in discovery.

3 b) Counsel for defendant desires additional time to review this discovery, consult  
4 with her client, conduct investigation and research related to the charge, to discuss potential  
5 resolutions with her clients, and to otherwise prepare for trial.

6 c) Counsel for defendant believes that failure to grant the above-requested  
7 continuance would deny her the reasonable time necessary for effective preparation, taking into  
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the  
11 case as requested outweigh the interest of the public and the defendant in a trial within the  
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
14 et seq., within which trial must commence, the time period of January 9, 2023 to March 27,  
15 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
16 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
17 of the Court's finding that the ends of justice served by taking such action outweigh the best  
18 interest of the public and the defendant in a speedy trial.

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2 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
3 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
4 must commence.

5 IT IS SO STIPULATED.

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7 Dated: December 6, 2022

PHILLIP A. TALBERT  
United States Attorney

8  
9 /s/ ADRIAN T. KINSELLA  
10 ADRIAN T. KINSELLA  
11 Assistant United States Attorney

12 Dated: December 6, 2022

13 /s/ MEGHAN MCLOUGHLIN  
14 MEGHAN MCLOUGHLIN  
15 Assistant Federal Defender  
16 Counsel for Defendant  
17 ERIC TERRELL CHRISTIAN

18  
19 ORDER

20 IT IS SO FOUND AND ORDERED.

21 Dated: December 7, 2022

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23 WILLIAM B. SHUBB  
24 UNITED STATES DISTRICT JUDGE